

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

**RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-30 Refer to the response to BSG-AG-2-30. Describe how the coated mains in Bay State's territory differ from those used by any other natural gas distribution utility. Describe how the excavation procedures for any other natural gas distribution utility differ from those employed by Bay State for the early (pre-1970) entrenchment of bare or unprotected coated steel pipes.

Response: The Company itself has not provided the detailed information in response to AG -2-30 (requesting names of mains and services manufacturer to be replaced) and AG-2-31 (describe the technical specification of the mains and services listed in AG-2-30) to permit a response to the first part of this question. As to the second part of this question, Mr. Cavallo did not compare the Company's pre-1970s pipe entrenchment procedures with that employed by other utilities